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JA 4027

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	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
IN RE:	:	
	:	CHAPTER 13
Lucille Limone	:	
	:	CASE NO. 09-34274-MS
DEBTOR.	:	NOTICE OF MOTION TO VACATE AUTOMATIC STAY
	:	
	:	ORAL ARGUMENT REQUESTED
	:	(RET: 01/07/2010@ 11:00am)

TO: Lucille Limone
29 Redwood Avenue
Wayne, NJ 07470

Marie-Ann Greenberg, Trustee
30 Bridges Road, Suite 230
Fairfield, NJ 07004

SIRS:

PLEASE TAKE NOTICE that on 01/07/2010@ 11:00am, or soon as counsel may be heard, the undersigned, attorneys for GMAC Mortgage, LLC the Secured Creditor, will move before the United States Bankruptcy Court, Honorable Morris Stern, presiding, U.S. Bankruptcy Court, 50

Walnut Street, 3rd Floor, P.O. Box 1352, Newark, NJ 07101-1352 for an Order Vacating the Automatic Stay, with respect to the debtor's property at 29 REDWOOD AVENUE, WAYNE, NJ 07470 and allowing GMAC Mortgage, LLC, the secured creditor, to continue its foreclosure action, by reason of failure of the debtor to make the regular monthly mortgage payments outside of the Chapter 13 Plan, and

TAKE FURTHER NOTICE that the facts GMAC Mortgage, LLC the Secured Creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor
GMAC Mortgage, LLC

/s/ JOEL A. ACKERMAN

JOEL A. ACKERMAN
MEMBER OF THE FIRM

DATED: December 17, 2009

<p>THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.</p>
